

EXHIBIT A

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PROSECUTING ATTORNEY
CIVIL DIVISION

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CLERK
KING COUNTY COUNCIL

IN THE SUPERIOR COURT FOR KING COUNTY
STATE OF WASHINGTON

NATASHA SARDEN,

Plaintiff,

v.

KING COUNTY, WASHINGTON, AND
JOHN DOE, A KING COUNTY CORRECTIONS
OFFICER

Defendants,

NO.

COMPLAINT FOR DAMAGES

NATASHA SARDEN, Plaintiff, sets forth her complaint for damages against these
Defendants in the manner as follows:

I. PARTIES

I.1. Plaintiff Natasha Sarden is over the age of 18 years. She resides in King
County, Washington.

I.2. King County has the capacity to be sued in the same manner as a private
person. King County is responsible for the acts and omissions of the employees and agents of
the King County Adult Detention Center in Seattle, Washington. It is sued as an independent
entity and under principles of vicarious liability.

I.3. John Doe was at relevant times an employee of King County and the King
County Adult Detention Center, known also as the King County Jail.

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II. JURISDICTION AND VENUE

II.1 The Court has jurisdiction of the subject matter and parties herein.

II.2 Venue of this action lies properly in King County, the site of the alleged wrongful acts and omissions in this case.

III. FACTS GIVING RISE TO LIABILITY

III.1 During a period of time running from October 2015 to March 2016, Plaintiff was an inmate at the King County Jail. During that period, she was repeatedly subjected to sexual and intimate contact with a King County Corrections Officer, John Doe, whose name will be supplemented at the appropriate time.

III.2 The acts and omissions of Defendants constituted the torts of sexual harassment and assault.

III.3 The acts and omissions of King County in the form, among others, of failure to oversee and supervise its corrections officers so as to prevent those officers from becoming involved in sexual activity, sexual harassment, and assault upon inmates, as well as breach of the jailor's duty to keep the inmate Plaintiff in health and safety, constituted the tort of negligence.

III.4 The acts of the Defendants constituted a violation of Washington's Law Against Discrimination, Chapter 49.60 RCW, in the form of sexual harassment based on gender.

III.5 The unlawful actions of John Doe who performed those acts under color of state law, constituted violation of 42 USC Section 1983, the Federal Civil Rights Act, in the

1 form of sexual harassment and assault and use of excessive force, in violation of Plaintiff's
2 4th and 14th Amendment rights.

3 III.6. The unlawful acts and omissions described above were a proximate result of
4 the customs and practices of the King County Jail relating to supervision of corrections
5 officers' relationships with inmates, and enforcement of policies relating to sexual
6 harassment of inmates.
7

8 III.7. As a proximate result of the wrongful acts and omissions of these Defendants,
9 Plaintiff has suffered bodily injury, emotional distress, pain and suffering, and loss of
10 enjoyment of life, in a monetary amount which will be established at time of trial.

11 **IV. WAIVER OF PHYSICIAN-PATIENT PRIVILEGE**

12 Plaintiff hereby notes her intent to waive the physician-patient privilege insofar
13 as waiver is required by the terms of RCW 5.60.060 (4) (b). That waiver shall extend no farther
14 than is required by that statute. The waiver shall take effect on the 89th day following the
15 filing of this lawsuit.
16

17 **V. PRAYER FOR RELIEF**

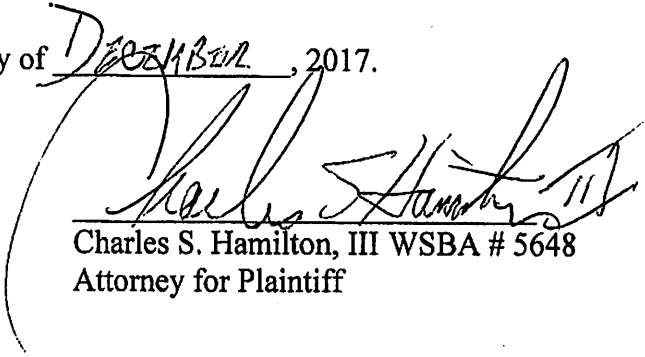
18 WHEREFORE, having fully set forth her claims for relief against these Defendants,
19 Plaintiff respectfully prays for the following relief:

20 V.1. That Plaintiff be awarded a money judgment against Defendants in an amount
21 which fully compensates her for her injuries and damages sustained herein.
22

23 V.2. That the Court award Plaintiff all taxable costs, including reasonable and
24 statutory attorney fees incurred in this matter, including reasonable fees supported by 42
25 USC Section 1988, and RCW 49.60.030.
26

1 V.3. That the Court accord Plaintiff such other relief as it finds to be fair and
2 equitable in the circumstances of the case.

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4 DATED this 15th day of DECEMBER, 2017.

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7 Charles S. Hamilton, III WSBA # 5648
8 Attorney for Plaintiff
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